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VIA ECF

March 12, 2025

Honorable Dale E. Ho
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Application GRANTED. The Initial Pretrial Conference and the parties' concomitant deadline to file a joint letter and proposed Civil Case Management Plan and Scheduling Order are both **ADJOURNED SINE DIE** pending the Court's resolution of issues of consolidation and the parties' request for a stay. **SO ORDERED.**

Dated: March 13, 2025
New York, New York



Dale E. Ho
United States District Judge

Re: *LaVallee v. Bandrowczak*, No. 1:25-cv-00371 (DEH) (the “Derivative Action”): Deadlines Regarding Initial Pretrial Conference and Stipulation to Stay

Dear Judge Ho:

We represent defendants Xerox Holdings Corporation, Steven J. Bandrowczak, Xavier Heiss, John G. Bruno, Tami A. Erwin, Priscilla Hung, Scott Latier, Nichelle Maynard-Elliott, Edward G. McLaughlin, John J. Roese, and Amy Schwetz (the “Defendants”) in the above-captioned Derivative Action. Pursuant to Rule 2(e) of the Court’s Individual Rules and Practices for Civil Cases, the parties respectfully write to request that the Court adjourn the Initial Pretrial Conference currently scheduled for March 20, 2025, at 10:00 a.m., and vacate the March 13, 2025 deadline to file a joint letter and Civil Case Management Plan and Scheduling Order. (ECF No. 16.)

On January 24, 2025, the parties filed a Proposed Stipulation and Order (ECF No. 13) to stay all proceedings and deadlines in the Derivative Action (“Stipulation to Stay”). Should the Court so-order the Stipulation to Stay, all proceedings and deadlines in the Derivative Action shall be stayed pending the resolution of the motion to dismiss in *Wilson v. Xerox Holdings Corporation*, 1:24-cv-08809 (DEH) (the “Securities Class Action”). (Stipulation to Stay ¶ 1.) Accordingly, the parties jointly request the adjournment of the Initial Pretrial Conference and associated deadlines until after the Court has resolved the Securities Class Action motion to dismiss. Other than the Stipulation to Stay itself, this is the first request for the relief sought.

We appreciate the Court’s consideration of this request, and are available at the Court’s convenience should Your Honor have any questions.

Respectfully submitted,

/s/ Shaimaa M. Hussein
Shaimaa M. Hussein

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/s/ Saadia Hashmi
Saadia Hashmi

Cc: All counsel of record (via ECF)